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7 Attorney for Applicant
8 Starship Entertainment Co., Ltd.

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN JOSE DIVISION

12 *In re Ex Parte* Application of) Case Number: 23-mc-80147-BLF
13)
14 Starship Entertainment Co., Ltd.,) **DECLARATION OF CARLOS MAKOTO**
15) **TAITANO IN SUPPORT OF**
16 Applicant.) **APPLICANT’S REQUEST FOR**
17) **PERMISSION TO ISSUE NEW**
18) **SUBPOENA TO GOOGLE LLC**
19)
20)

21 I, Carlos Makoto Taitano, declare that:

22 1. I am more than eighteen years of age, am competent to testify, and have personal
23 knowledge of the matters set for herein.

24 2. I am counsel of record for the Applicant, Starship Entertainment Co., Ltd.
25 (hereinafter “**Applicant**”).

26 3. This declaration is in support of the Applicant’s Request for Permission to Issue
27 New Subpoena to Google LLC.

28 4. On May 26, 2023, the Applicant caused the Subpoena and this Court’s May 24,
2023 Order Granting Ex Parte Application to Authorize Foreign Discovery to be served upon
Google LLC (hereinafter “**Google**”); a true and correct copy of the proof of service is attached
hereto as **Exhibit A**.

5. On July 15, 2023, Google provided information in response to the Subpoena; a true
and correct copy of the files contained in the Zip file that was downloaded from Google’s Legal
Retrievals website are attached hereto as **Exhibit B**.

Civil Action No. 23-mc-80147-BLF

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* Google LLC. C/O CSC Lawyers Inc.
 on *(date)* 5/24/2023

☒ I served the subpoena by delivering a copy to the named person as follows: Koy Saechao, authorized
To accept for agent Google LLC. C/O CSC Lawyers Inc. 2710 Gateway Oaks Dr.
suite 150N Sacramento, Ca 885333 on *(date)* 5/26/2023 1:50 pm or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
 tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
 \$ _____

My fees are \$ 55.00 for travel and \$ _____ for services, for a total of \$ 55.00

I declare under penalty of perjury that this information is true.

Date: 5/28/2023

Server's signature

Perdea Rich RPS# 2010-103 Sacramento County

Printed name and title

Sacserves.com 813 Harbor Blvd, West Sacramento, CA
95961 916-710-6070

Server's address

Additional information regarding attempted service, etc.:

**ORIGINAL
DOCUMENT**
Blue Signature

Legacy YT User Name	External User Id	Channel URL	Signup Email	Account Status	Account Creation Time	Signup IP	Display Name	First Name	Last Name	User Provided Country	Date Of Birth	Account Soft-Deletion Time
	nMCQ6hbm5KkuGt9KH9JUF	/@	taldeogsuyongso-2032@pages.plusgoogle.com (unconfirmed)	ACTIVE	2021-11-12 07:49:30 UTC	183.98.215.48	æíř'ë•''ís@ìtæë' Sojang	æíř'ë•''ís@ìtæë' Sojang		South Korea	1/1/2023	

Exhibit B

****All information contained alongside this file within the ZIP container is Google Confidential and Proprietary****

Export Summary

Originating Identifier: nMCQ6hbm5kKuGt9KH9lJFQ [YouTube External User ID]

Resolved Identifier: 573523820572 [Google Account ID]

Service: YouTube and YouTube Music

Resource: Basic Subscriber Info

Start of date range: Not Specified.

End of date range: 2022-12-28 23:59:00 UTC

[illegible]

Exhibit B

****All information contained alongside this file within the ZIP container is Google Confidential and Proprietary****

Export Summary

Originating Identifier: RR1Bg_Aqj_SmEF1y7m18fg [YouTube External User ID]

Resolved Identifier: 40831240012 [Google Account ID]

Service: YouTube and YouTube Music

Resource: Basic Subscriber Info

Start of date range: Not Specified.

End of date range: 2022-12-28 23:59:00 UTC



google-legal-support@google.com
www.google.com

Via Email Only
cmakototaitano@taitano.us.com

Exhibit B

Google LLC
1600 Amphitheatre Parkway
Mountain View, California 94043



google-legal-support@google.com
www.google.com

Hash Values for Production Files (Internal Ref. No. 35689809)

40831240012.YoutubeAndYoutubeMusic.BasicSubscriberInfo_001.zip:

SHA512-

ff86cb9dfd51b0e225dacfebe92b60ff7110eb64f8ebd8ce5c30bb8b0c3494aa15264dc886f718a9bce62dfb6f
db21fc6046f27d3bda1a4fe2c71d000094611a

573523820572.YoutubeAndYoutubeMusic.BasicSubscriberInfo_001.zip:

SHA512-

3a076b038e31449b2aadf9240d90c164a0719b02dfc55303467866e91bbb6a11a26804f197a0c6bae0165ca
1618113c966ffcd0fb8c3a21ad556d150afbcddd3

Google LLC
1600 Amphitheatre Parkway
Mountain View, California 94043



google-legal-support@google.com
www.google.com

CERTIFICATE OF AUTHENTICITY

I, Aamir Hasnat, certify:

1. I am a Custodian of Records for Google LLC ("Google"), located in Mountain View, California. I am authorized to submit this Certificate of Authenticity on behalf of Google in response to a subpoena dated May 24, 2023 (Google LLC Internal Reference No. 35689809) in the matter of *In re Ex Parte Application of Starship Entertainment, Co., Ltd.*. I have personal knowledge of the following facts and could testify competently thereto if called as a witness.

2. The accompanying file(s) contain true and correct copies of records pertaining to the Youtube account(s) associated with www.youtube.com/@talduksojang, www.youtube.com/@sojang9724, <https://www.youtube.com/@IIIIIIIIIIIIIIIIIIIIIIIIIIIIIIII> ("Document").

3. The documents attached hereto reflect records made and retained by Google. The records were made at or near the time the data was acquired, entered, or transmitted to or from Google; the records were kept in the course of a regularly conducted activity of Google; and the making of the records were a regular practice of that activity.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

DATED: July 14, 2023

A handwritten signature in black ink, appearing to read "Aamir Hasnat".

Aamir Hasnat, Custodian of Records for Google LLC

cmakototaitano@taitano.us.com

From: google-legal-support@google.com
Sent: Wednesday, July 19, 2023 4:51 AM
To: cmakototaitano@taitano.us.com
Subject: RE: Courtesy Copy of Subpoena for 23-mc-80147-BLF (Reference #35689809)

Mr. Taitano,

I'm happy to discuss this matter further over a phone call. As you have noted, the underlying accounts appear to have been deleted, so we have produced the preserved information associated with the requested accounts that is readily available. With respect to the account listed as <https://www.youtube.com/@talduksojang>, as you have noted, this appears to be a new URL for the account listed as <https://www.youtube.com/@> and as such the associated registration information is the same. We are investigating what other information may be available for production, and will follow up with a supplemental production once we have identified any responsive information. So that we can discuss this matter further, could you please advise if you are available at either of the below listed times for a call?

- Wednesday, July 19 at 1:00 PM Pacific
- Thursday, July 20 at 11:00 AM Pacific

Please let me know if either of these times work for you or if there is an alternative time you would prefer. While our department does not have an external phone number, we are happy to initiate the call or circulate a dial-in. To that end, could you please confirm if +1-671-777-0581 is a good number to reach you?

Regards,

Aamir Hasnat
Google Legal Investigations Support

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    "account": [{
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          "state": "인천광역시",
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          "email": "daetobs@gmail.com",
          "phone": "",
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          "phone": "",
          "fax": "",
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        },
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      "billingCustomerNumber": "981496761952",
      "billingAccountNumber": "9984175387547121",
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        "billingSignupStatus": "CLOSED",
        "calculationTime": "1687500201010",
        "signupRequestSequenceNumber": "1687500507363668",
        "lastSyncTime": "1687500507737"
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    "countryCode": "KR",
    "currencyCode": "USD"
  }
]
}

```

cmakototaitano@taitano.us.com

From: google-legal-support@google.com
Sent: Thursday, August 10, 2023 4:47 AM
To: cmakototaitano@taitano.us.com
Subject: RE: 23-mc-80147-BLF (Reference #35689809)

Mr. Taitano,

I have confirmed that we would require a new subpoena specifically identifying the underlying Gmail account in order to produce any additional responsive information. As a one-time courtesy in this matter, we have preserved account information to the extent possible while you seek a new subpoena. So that I can ensure accurate processing of the new subpoena, please send a courtesy copy of the new subpoena in a direct reply in this email thread. If you have any further questions, please let me know.

Regards,

Aamir Hasnat
Google Legal Investigations Support